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**REMARKS**

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Claims 1-23 are pending in the application. Claims 1-13 and 16-21 were rejected under 35 U.S.C. § 102(b). Claims 14-15 and 22 were rejected under 35 U.S.C. § 103(a).

**Rejection Under 35 U.S.C. § 102(b)**

Claims 1-13 and 16-21 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent Number 6,266,514 issued to O'Donnell on July 24, 2001.

Applicants have avoided this ground of rejection for the following reasons.

Applicants' claim 1, as amended, now recites:

"a network component that employs a) one or more call characteristics to make a determination to initiate a request for one or more positions of one or more mobile stations and b) one or more call parameters to identify one or more cellular network cells associated with the one or more mobile stations;

wherein the network component receives, in response to the request, the one or more positions of the one or more mobile stations from a position component; and

wherein the position component determines the one or more positions of the one or more mobile stations continuously

O'Donnell does not teach this limitation. Instead, O'Donnell discloses a technique for mapping areas of poor coverage in a cellular network. When a quality measurement surpasses any of one or more specified thresholds, O'Donnell determines the geographical location from which the measurement was transmitted, as stated in column 5, lines 45-49. However, contrary to applicants' claim 1, O'Donnell does not teach "a network component that employs a) one or more call characteristics to make a determination to initiate a request for one or more positions of one or more mobile stations and b) one or more call parameters to identify one or more cellular network cells associated with the one or more mobile stations". Thus, O'Donnell is missing the

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"one or more call parameters to identify one or more cellular network cells associated with the one or more mobile stations" element, as stated in applicants' claim 1.

In view of the foregoing, applicants submit that O'Donnell does not describe each and every element of claim 1, and therefore claim 1 is not anticipated by O'Donnell. Since claims 2-13 and 16-17 depend from allowable claim 1, these claims are also allowable over O'Donnell.

Independent claims 18 and 21 each have a limitation similar to that of independent claim 1, which was shown is not taught by O'Donnell. For example, claim 18 recites, "initiating a request for one or more positions of one or more mobile stations through employment of a) one or more call characteristics and b) one or more call parameters to identify one or more cellular network cells associated with the one or more mobile stations", and claim 21 recites, "means in the one or more media for initiating a request for one or more positions of one or more mobile stations through employment of a) one or more call characteristics and b) one or more call parameters to identify one or more cellular network cells associated with the one or more mobile stations". O'Donnell does not teach these limitations for the above-mentioned reasons. Therefore, claims 18 and 21 are likewise allowable over O'Donnell. Since claims 19-20 depend from claim 18, these dependent claims are also allowable over O'Donnell.

#### Rejection Under 35 U.S.C. § 103(a)

Claims 14 and 15 were rejected under 35 U.S.C. § 103(a) as being unpatentable over O'Donnell in view of U.S. Patent Application Number 20050119013 issued to Jeong et al. dated June 2, 2005.

Claim 22 was rejected under 35 U.S.C. § 103(a) as being unpatentable over O'Donnell in view of U.S. Patent Number 6,233,448 issued to Alperovich et al. on May 15, 2001.

Applicants respectfully traverse these grounds of rejection.

These rejections are based on the rejection under U.S.C. § 102(b) being proper. As that ground of rejection has been overcome, and none of the cited references teach or suggest "a network component that employs a) one or more call characteristics to make a determination to initiate a request for one or more positions of one or more

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mobile stations and b) one or more call parameters to identify one or more cellular network cells associated with the one or more mobile stations", as recited in applicants' independent claim 1, the combination of O'Donnell with Jeong and Alperovich does not supply this missing element. Thus, this combination does not make obvious any of applicants' claims, all of which require the aforesaid limitation.

#### New Claim

New claim 23 has been added. Claim 23 provides an additional limitation directed to the thresholds. No new matter has been added.

#### Conclusion

It is respectfully submitted that the Office Action's rejections have been overcome and that this application is now in condition for allowance. Reconsideration and allowance are, therefore, respectfully solicited.

If, however, the Examiner still believes that there are unresolved issues, he is invited to call applicants' attorney so that arrangements may be made to discuss and resolve any such issues.

Respectfully submitted,



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